



LAW OFFICES OF

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Employment, & Civil Litigation

The parties are directed to meet and confer in order to rectify any errors (e.g., numbering and blank citations) in the Joint Rule 56.1 Statement (Doc. 174).

The parties shall thereafter, by 5:00 p.m. on July 8, 2022, file a Revised Joint 56.1 Statement. Plaintiff's opposition to Defendant's pending pre-motion conference letter shall likewise be filed by 5:00 p.m. on July 8, 2022.

The Joint Rule 56.1 Statement was incorrectly filed as a motion. The Clerk of the Court is therefore respectfully directed to terminate the motion sequences pending at Doc. 174 and Doc. 176.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 7, 2022

28 Wilson Place
Cornwall, New York 12518
Fax: (845) 595-2266

July 6, 2022

Daly v. Westchester Board of Legislators
Action No. 19-cv-04642 (PMH)

Dante Daly in this disability discrimination action against defendant. Defense counsel takes no position with respect to this request. On behalf of plaintiff, the undersigned requests that Your Honor extend the deadline to file plaintiff's (and/or his portion of) Rule 56.1 Statement and pre-motion letter for an additional two (2) days until on or by Friday, July 8, 2022 at 5:00 PM.

The main reasons for Plaintiff's request for this extension is that, yesterday, I had multiple problems with respect to finalizing the Joint Rule 56.1 Statement (in the "Statement") as I used a MicroSoft document converted from its PDF form, for which I worked approximately eight (8) hours almost continuously. As a result, there are significant errors in the Statement, and also was unable to write and file plaintiff's pre-motion letter. I had a conversation with defense counsel in which I acknowledged that the Statement had significant errors. I worked only one (1) day of the July 4th Holiday due to health issues and because my nephew and his family came to visit our family from Denver over the weekend.

On behalf of Plaintiff, and with no position taken by defense counsel, the undersigned respectfully requests that the Court extend the deadlines for plaintiff's (and/or its portion thereof) of his Rule 56.1 Statement and pre-motion letter for an additional two (2) days until on or by July 8, 2022 at 5:00 PM. This is plaintiff's 2nd request for an extension of the deadline.

Thank you for Your Honor's attention.

Respectfully Submitted,

/s/ Jimmy M. Santos

Jimmy M. Santos, Esq.

cc: Irma M. Cosgriff, Esq., defendant's counsel
(via ECF only)